

ATTACHMENT 1

SONOS

May 8, 2023

Who is Sonos?

SONOS

- American developer and manufacturer of networked multi-room audio products
- Founded in 2002
- Based in Santa Barbara, California
- Partner with 100+ companies including **Apple Music, Spotify, Pandora, Amazon Music, iHeartRadio, SiriusXM, and Tidal**



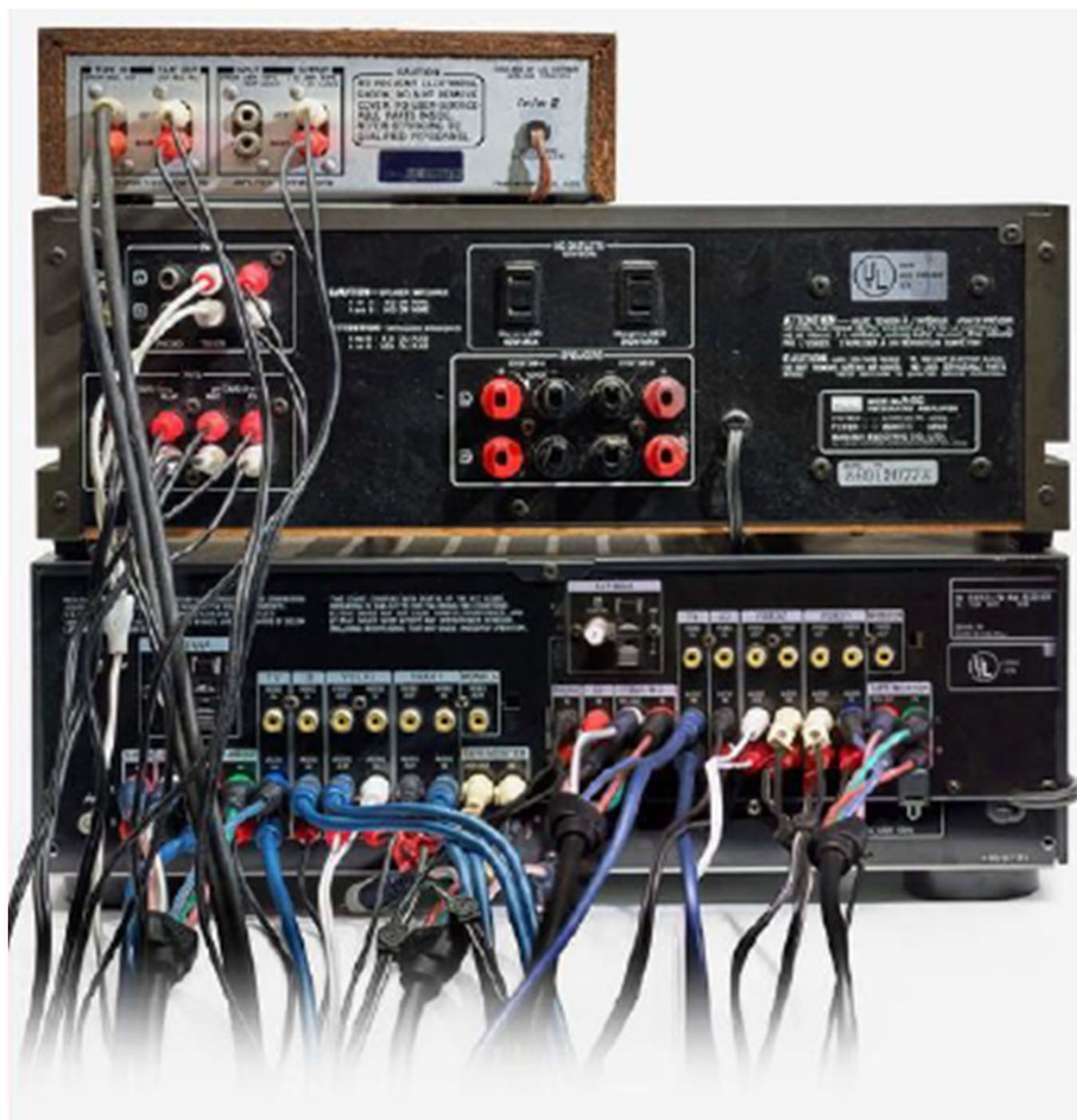
Nick Millington



Nick Millington
Chief Innovation Officer

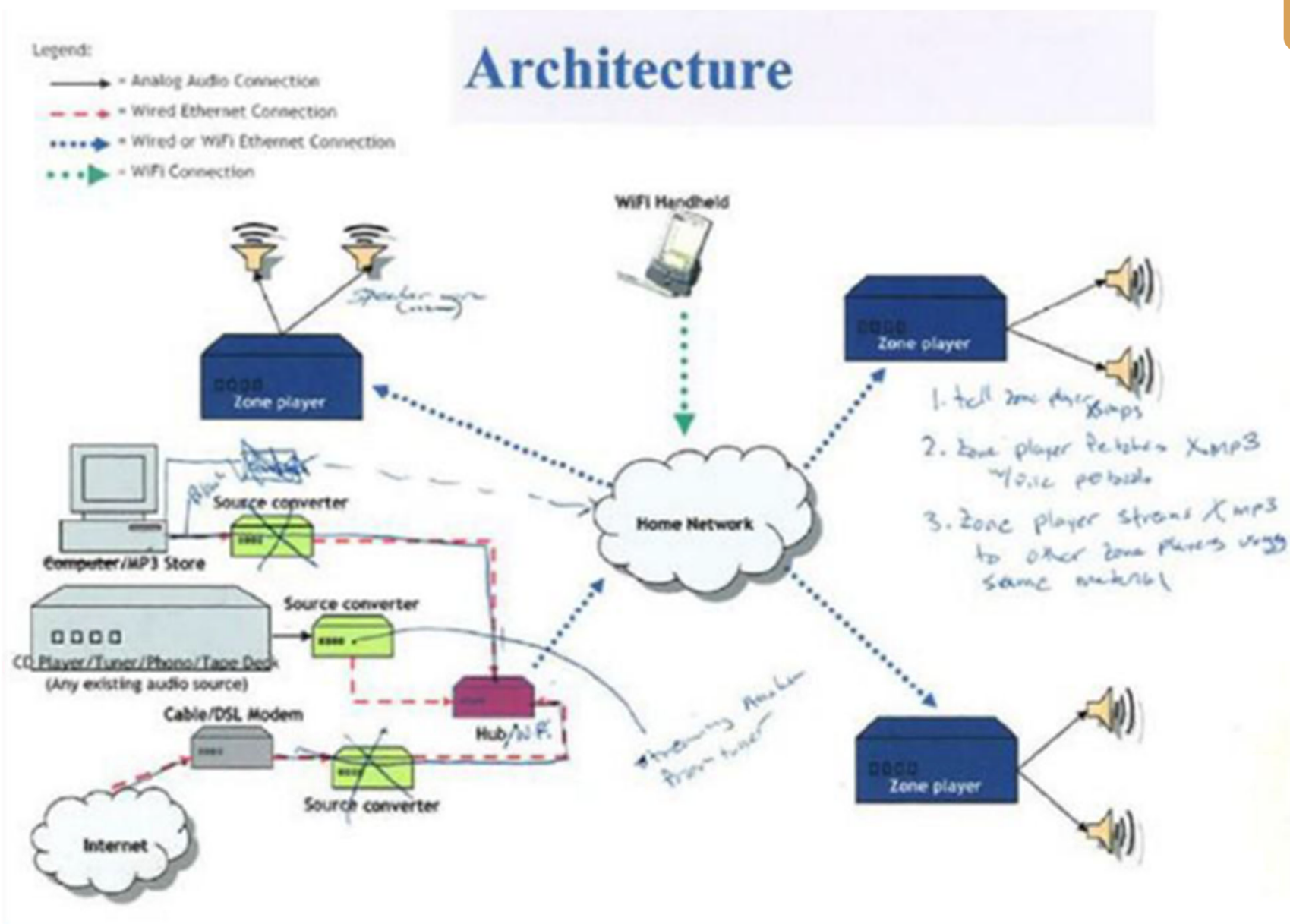
SONOS

Conventional Home Audio Systems



Sonos Vision

SONOS



Sonos Releases First Products in 2005

SONOS



Sonos's Early Recognition And Awards



**#1 Product
2005**



February 3, 2005
Sonos ZonePlayer ZP100



Praise For Sonos



“If you're not familiar with **Sonos, this company revolutionized the home audio world a decade ago... If you wanted the same song in every room, no problem, the tracks would be perfectly in sync ... At the time, this was **mind blowing**.”**

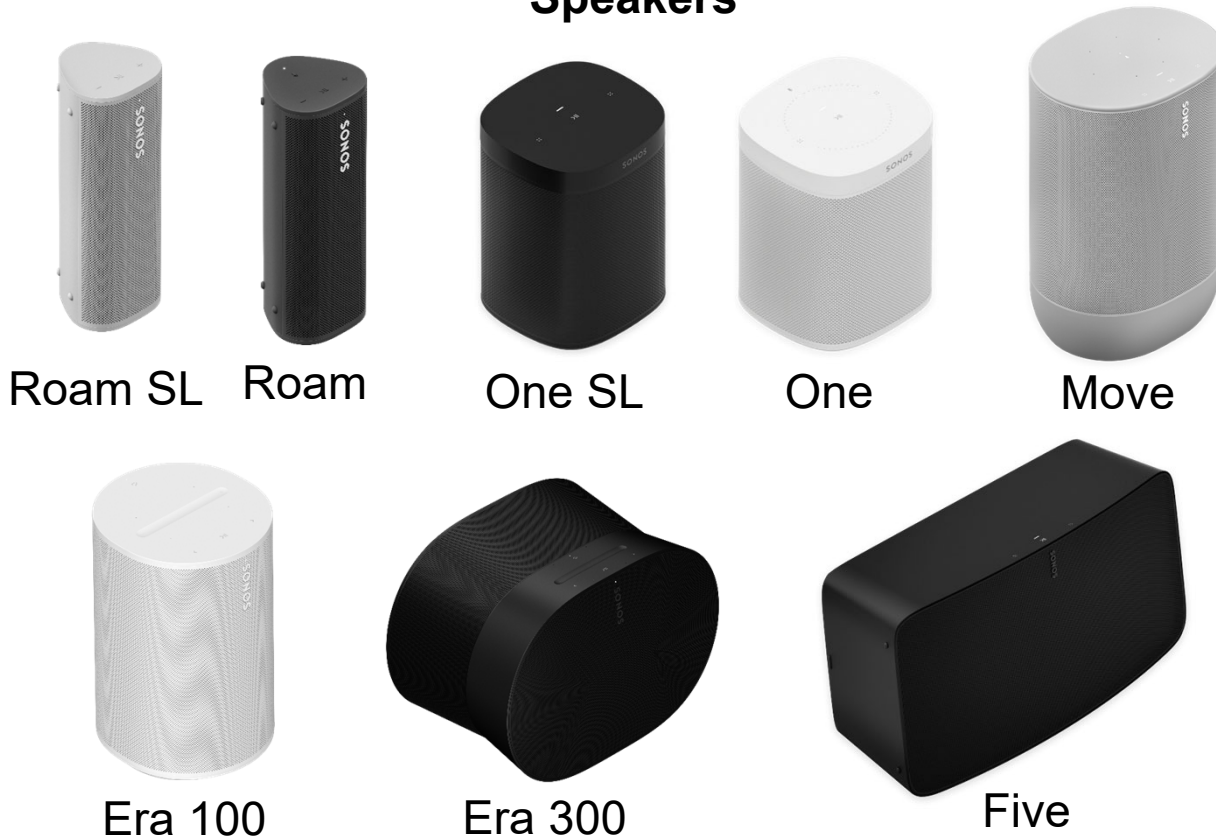
awesome.

Not that we didn't see this coming: Sonos first introduced a Play:5 at \$399, then a Play:3 at \$299, so a Play:1 at \$199 was inevitable. (There's also a \$699 PlayBar designed to sit under your TV.) That \$199 price tag seems to be a magic number, too: The Play:1 is the cheapest way to get started on a Sonos system, not to mention adding additional rooms to a system that you may already have.

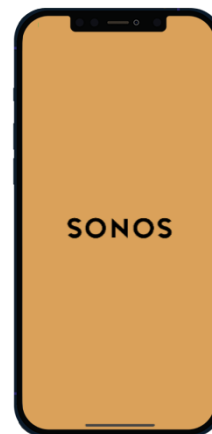
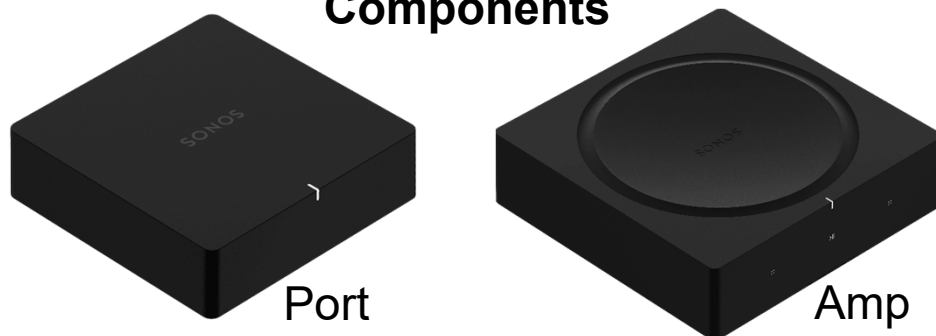
The Play:1 is a single speaker, meaning that the music comes out in mono. However, Sonos' system lets you add a second speaker in the same room, and pair them for stereo sound. And while, like all Sonos gear, you control it mainly through a phone or tablet, this has a new play/pause button, that gives you basic control in places like a kitchen or bathroom, where you may not want to be fumbling with an iPhone.

Current Sonos Products

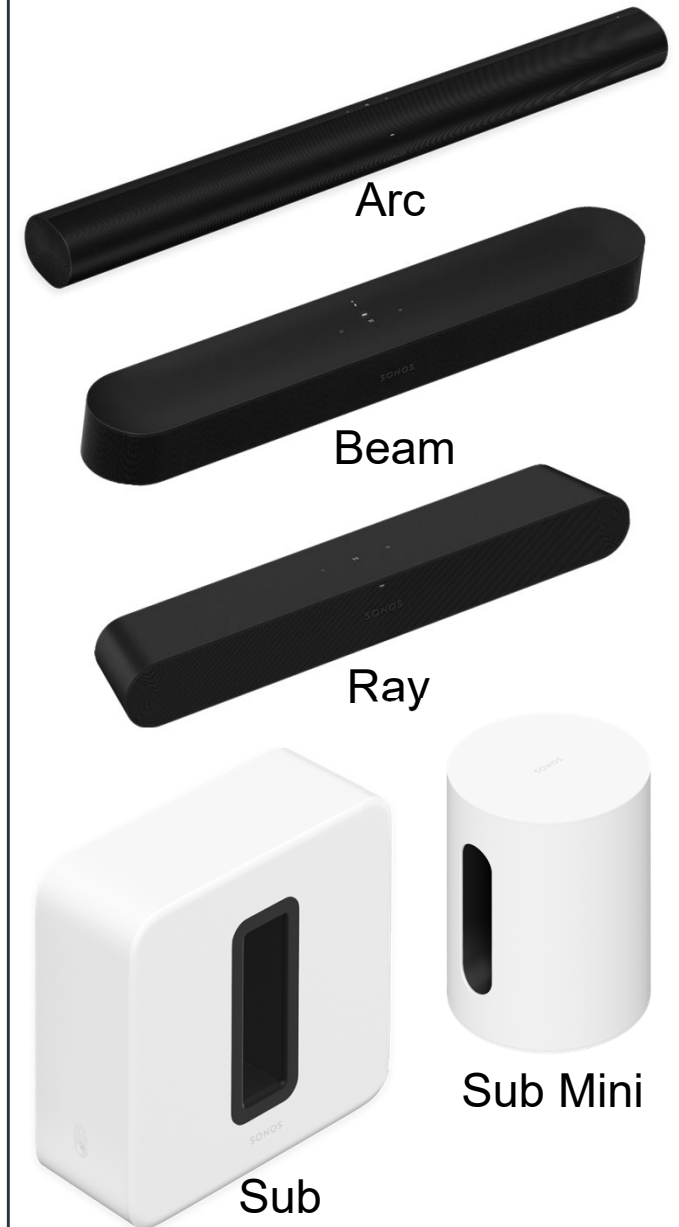
Speakers



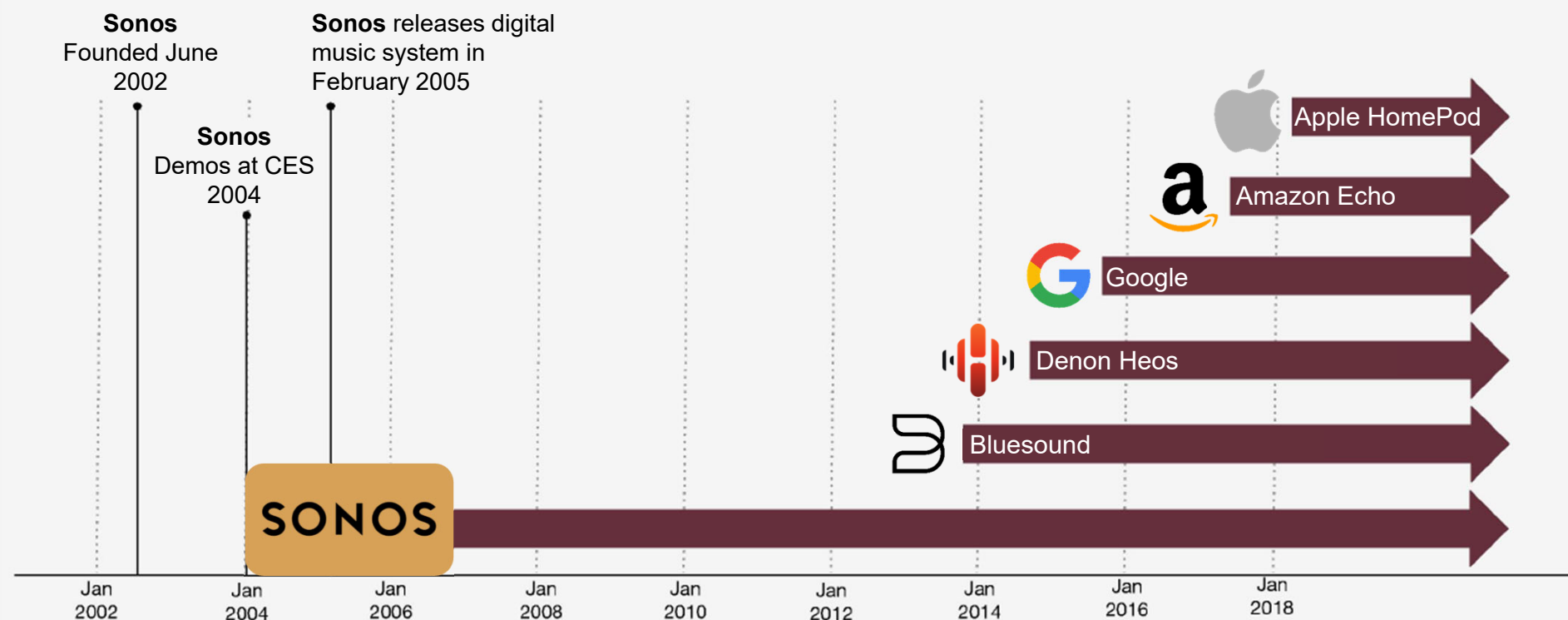
Components



Home Theater



Sonos Innovation Widely Adopted



Key Points

Sonos “Zone Scene” Patents

Google Infringes

No Non-Infringing Alternatives

Sonos Patents Valid

Damages Owed To Sonos

Rob Lambourne



Rob Lambourne


Director of UX

SONOS



Rob Lambourne
Inventor

SONOS



'885

(12) **United States Patent**
Lambourne

(10) Patent No.: **US 10,848,885 B2**
(45) Date of Patent: ***Nov. 24, 2020**

(54) **ZONE SCENE MANAGEMENT**

(71) Applicant: **SONOS, INC.**, Santa Barbara, CA (US)

(72) Inventor: **Robert A. Lambourne**, Santa Barbara, CA (US)

(73) Assignee: **Sonos, Inc.**, Santa Barbara, CA (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 0 days.
This patent is subject to a terminal disclaimer.

(21) Appl. No.: **16/383,561**

(22) Filed: **Apr. 12, 2019**

(65) **Prior Publication Data**
US 2019/0239008 A1 Aug. 1, 2019

Related U.S. Application Data

(63) Continuation of application No. 15/130,919, filed on Apr. 15, 2016, which is a continuation of application (Continued)

(51) Int. Cl. **G06F 17/00** (2019.01)
H04R 27/00 (2006.01)
(Continued)

(52) U.S. Cl. **H04R 27/00** (2013.01); **G05B 15/02** (2013.01); **G06F 3/0482** (2013.01);
CPC (Continued)

(58) **Field of Classification Search**
CPC — H04R 27/00; H04R 3/12; H04R 2227/005; H04R 2430/01; G05B 15/02;
(Continued)

(56) **References Cited**

U.S. PATENT DOCUMENTS

3,956,591 A 5/1976 Gates, Jr.
4,105,974 A 8/1978 Rogers
(Continued)

FOREIGN PATENT DOCUMENTS

CA 2320451 A1 3/2001
CN 1598767 A 3/2005
(Continued)

OTHER PUBLICATIONS



Yamaha DME Designer 3.5 user manual (Year: 2004).
(Continued)

Primary Examiner — Paul C. McCord


(57) **ABSTRACT**

An example playback device in a first zone of a media playback system receives a first indication that the first zone has been added to a first zone scene including a first preconfigured grouping of zones including the first zone and a second zone. The playback device receives a second indication that the first zone has been added to a second zone scene including a second preconfigured grouping of zones including the first zone and a third zone. After a given one of the first and second zone scenes has been selected for invocation, the playback device receives an instruction to operate in accordance with the given zone scene, and based on the instruction, begins operating in accordance with the given zone scene such that the playback device is configured to play back audio in synchrony with one or more other playback devices in the media playback system.

20 Claims, 11 Drawing Sheets

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
TX0003
3:20-cv-06754-WHA



'966

(12) **United States Patent**
Lambourne

(10) Patent No.: **US 10,469,966 B2**
(45) Date of Patent: **Nov. 5, 2019**

(54) **ZONE SCENE MANAGEMENT**

(71) Applicant: **SONOS, INC.**, Santa Barbara, CA (US)

(72) Inventor: **Robert A. Lambourne**, Santa Barbara, CA (US)

(73) Assignee: **Sonos, Inc.**, Santa Barbara, CA (US)

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 0 days.

(21) Appl. No.: **16/383,565**

(22) Filed: **Apr. 12, 2019**

(65) **Prior Publication Data**
US 2019/0239009 A1 Aug. 1, 2019

Related U.S. Application Data

(63) Continuation of application No. 15/130,919, filed on Apr. 15, 2016, which is a continuation of application (Continued)

(51) Int. Cl. **G06F 17/00** (2019.01)
H04R 27/00 (2006.01)
(Continued)

(52) U.S. Cl. **H04R 27/00** (2013.01); **G05B 15/02** (2013.01); **G06F 3/0482** (2013.01);
CPC (Continued)

(58) **Field of Classification Search**
CPC — H04R 27/00; H04R 3/12; H04R 2227/005; H04R 2430/01; G05B 15/02;
(Continued)

(56) **References Cited**

U.S. PATENT DOCUMENTS

3,956,591 A 5/1976 Gates, Jr.
4,105,974 A 8/1978 Rogers
(Continued)

FOREIGN PATENT DOCUMENTS

CA 2320451 A1 3/2001
CN 1598767 A 3/2005
(Continued)

OTHER PUBLICATIONS



Yamaha DME Designer 3.5 user manual (Year: 2004).
(Continued)

Primary Examiner — Paul C. McCord

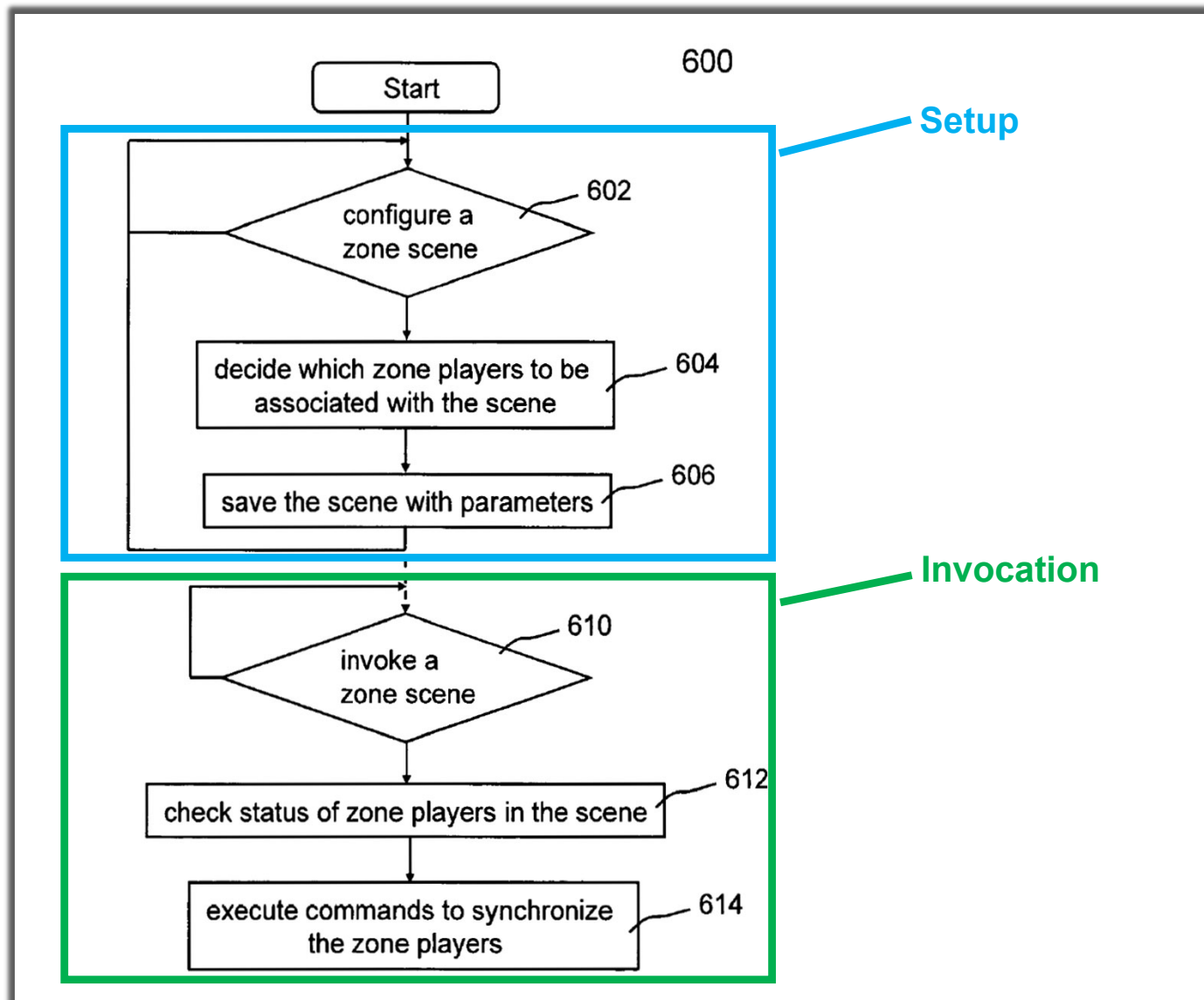
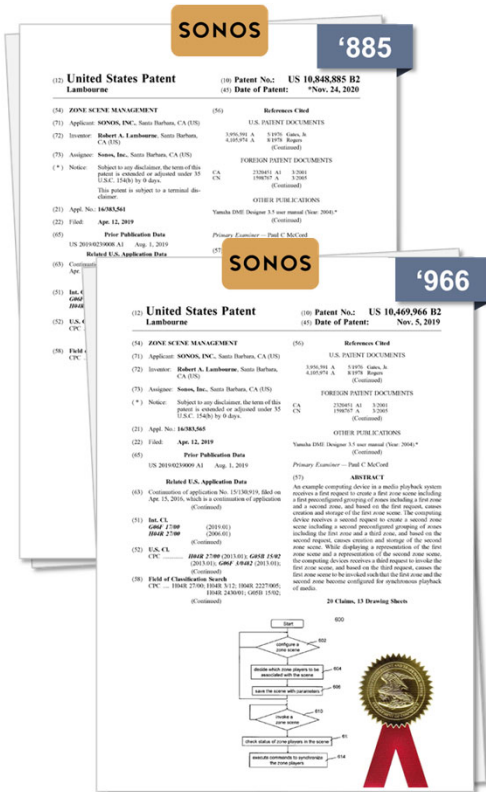
(57) **ABSTRACT**

An example computing device in a media playback system receives a first request to create a first zone scene including a first preconfigured grouping of zones including a first zone and a second zone, and based on the first request, causes creation and storage of the first zone scene. The computing device receives a second request to create a second zone scene including a second preconfigured grouping of zones including the first zone and a third zone, and based on the second request, causes creation and storage of the second zone scene. While displaying a representation of the first zone scene and a representation of the second zone scene, the computing device receives a third request to invoke the first zone scene, and based on the third request, causes the first zone scene to be invoked such that the first zone and the second zone become configured for synchronous playback of media.

20 Claims, 13 Drawing Sheets

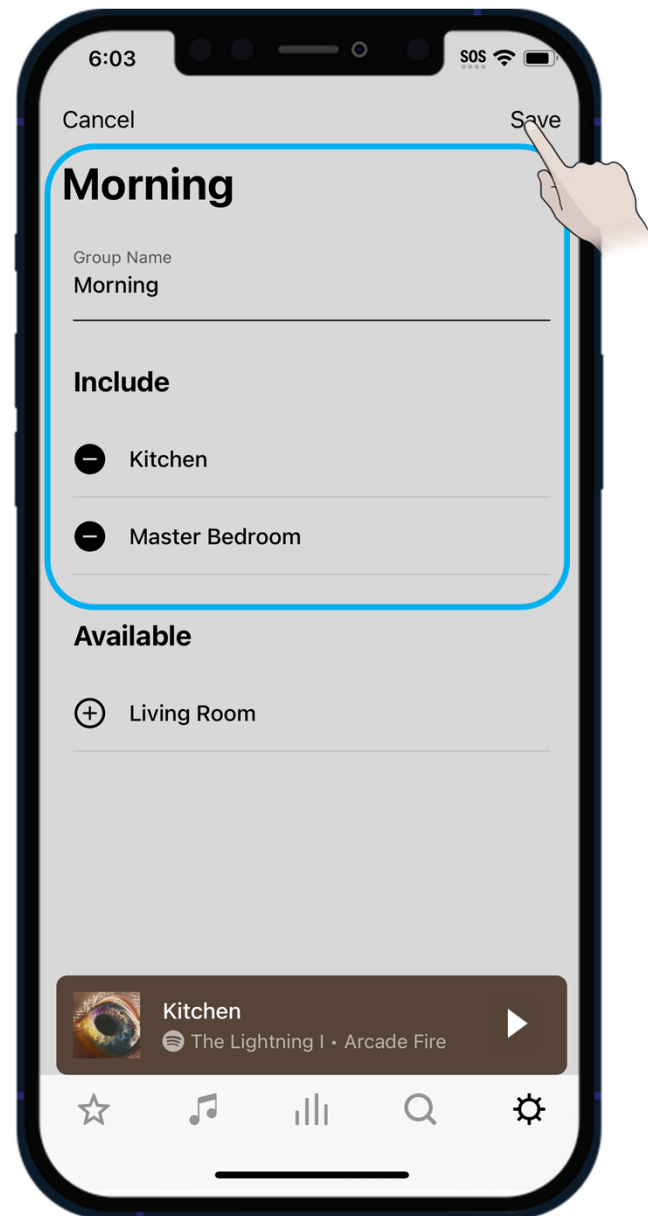
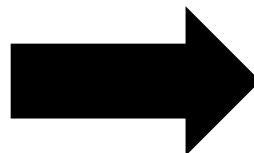
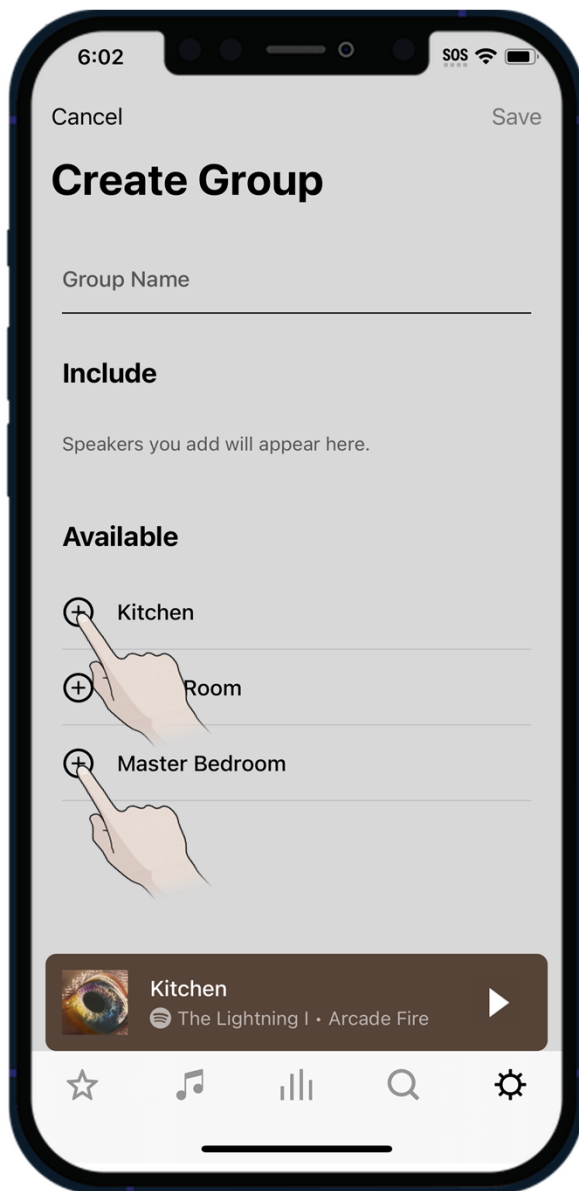



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
TX0001
3:20-cv-06754-WHA

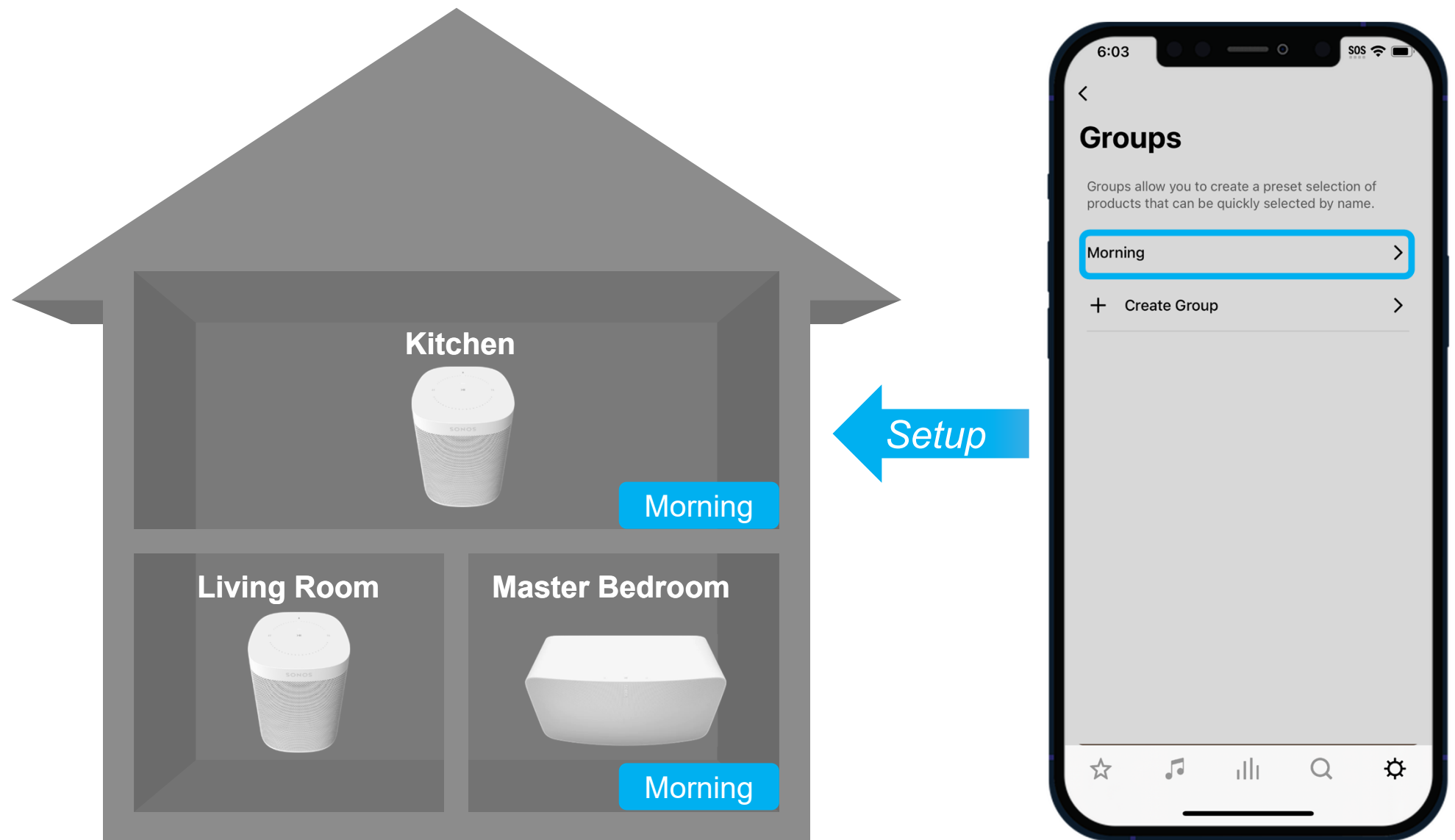


'885 Patent at Fig. 6

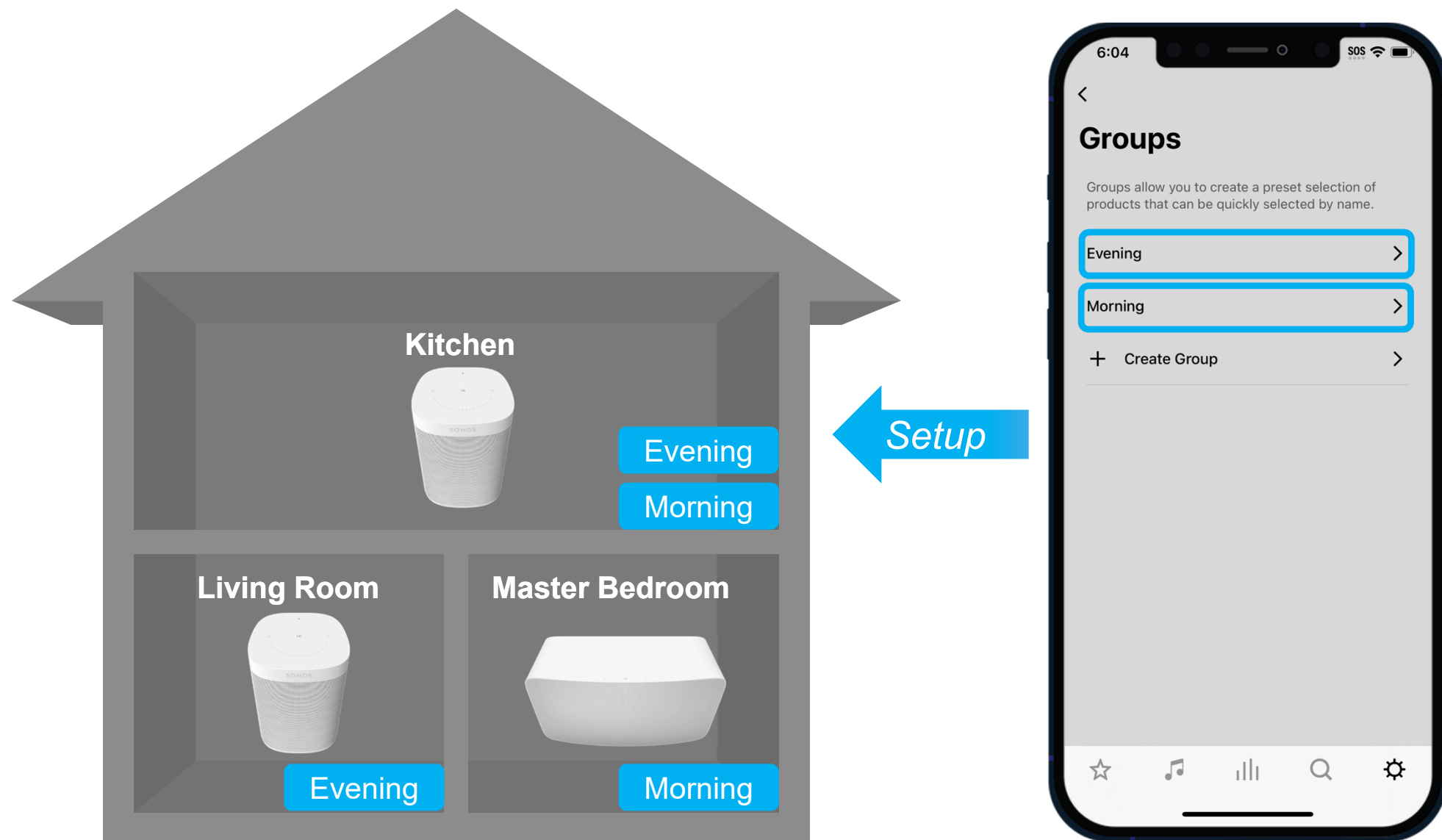
Sonos's "Zone Scene" Grouping



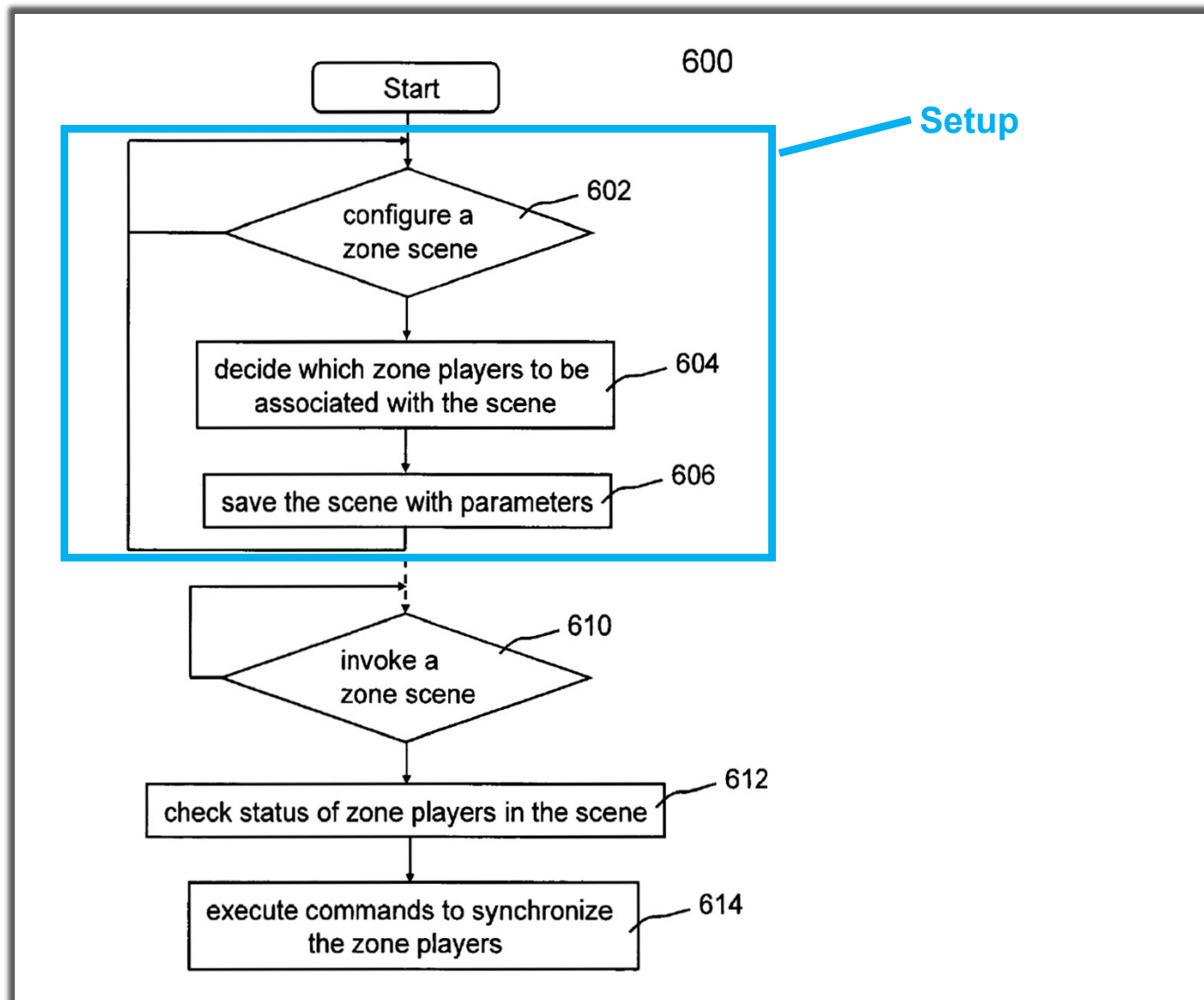
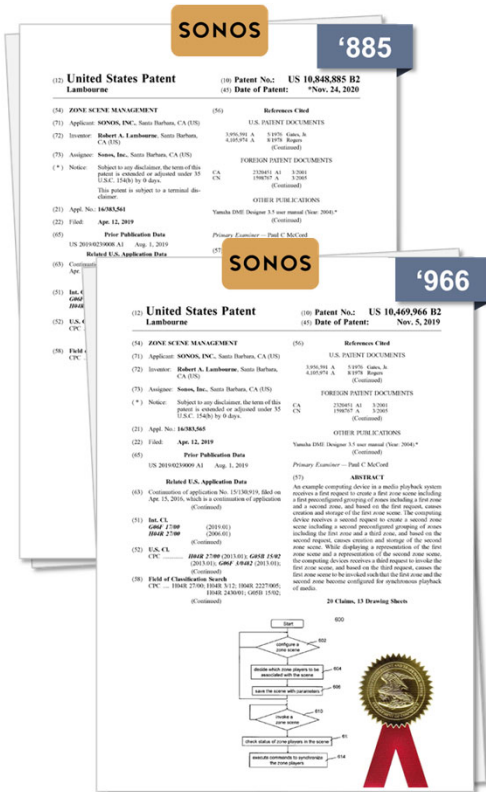
Sonos's "Zone Scene" Grouping



Sonos's "Zone Scene" Grouping

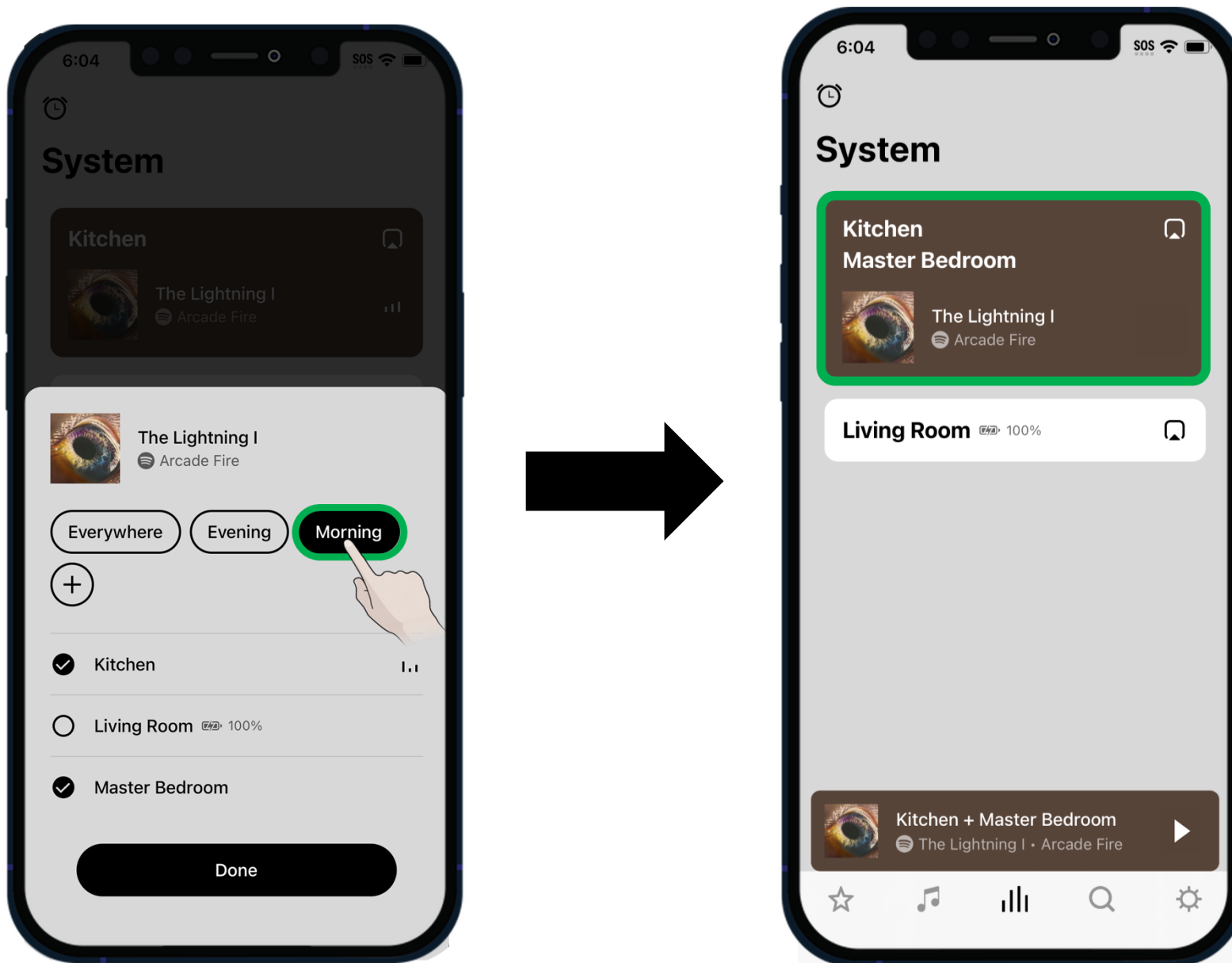


SONOS



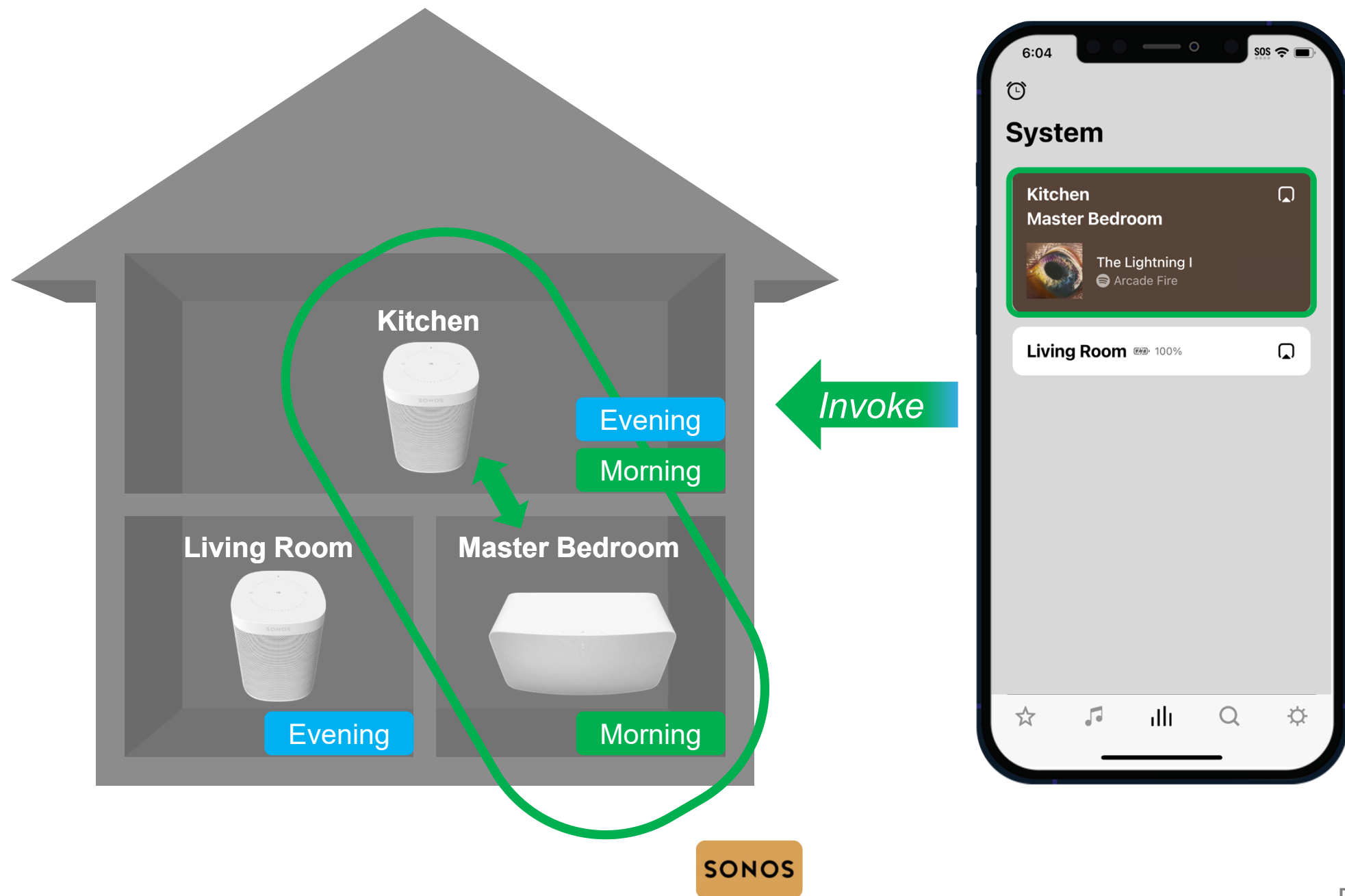
'885 Patent at Fig. 6

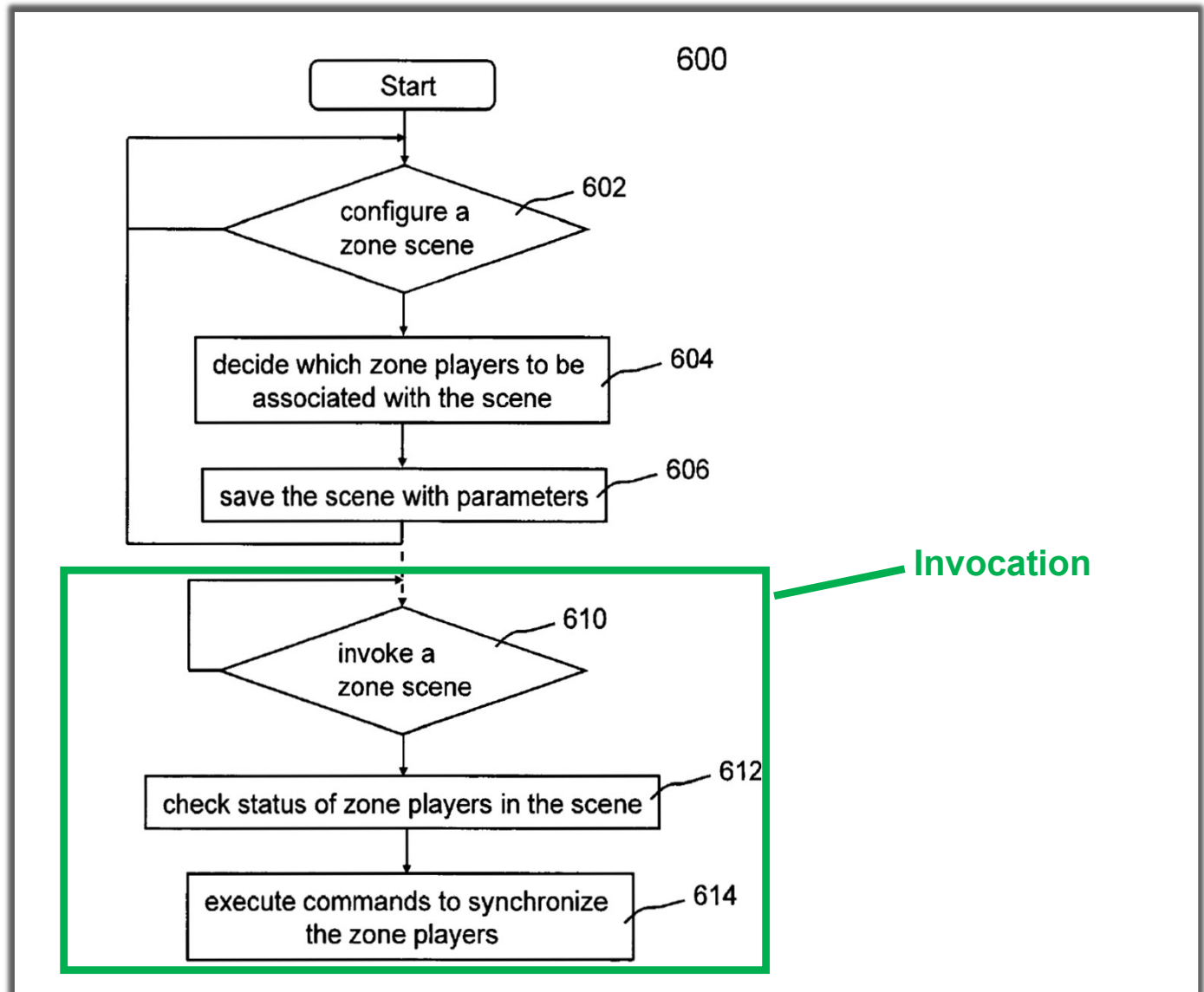
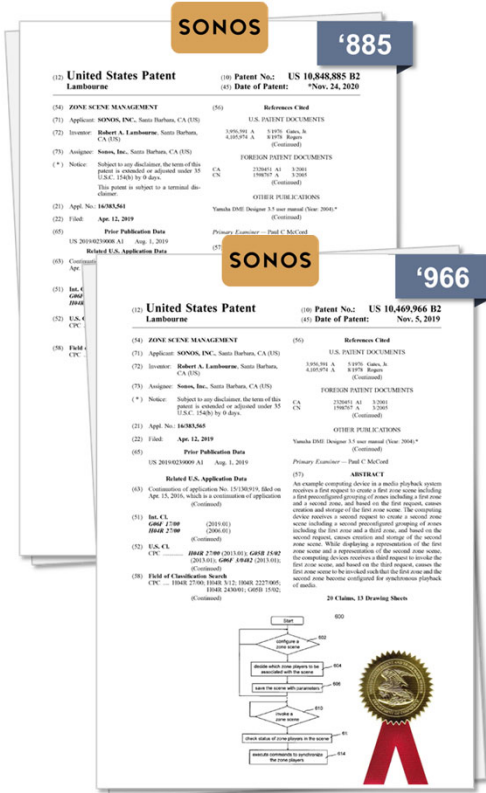
Sonos's "Zone Scene" Grouping



SONOS

Sonos's "Zone Scene" Grouping





'885 Patent at Fig. 6

Key Points

Sonos “Zone Scene” Patents

Google Infringes

No Non-Infringing Alternatives

Sonos Patents Valid

Damages Owed To Sonos

Infringement – Conclusion

Asserted Claims

Accused Google Products

Version

Google
Infringe?

'885 Patent
Claim 1



Google

Prior Versions
(Nov. 2020 – Present)



Infringement of '885 Patent, Claim 1

- [1.0]** A first zone player comprising:
 - [1.1]** a network interface that is configured to communicatively couple the first zone player to at least one data network;
 - [1.2]** one or more processors;
 - [1.3]** a non-transitory computer-readable medium; and
 - [1.4]** program instructions stored on the non-transitory computer-readable medium that, when executed by the one or more processors, cause the first zone player to perform functions comprising:
 - [1.5]** while operating in a standalone mode in which the first zone player is configured to play back media individually in a networked media playback system comprising the first zone player and at least two other zone players:
 - [1.6]** (i) receiving, from a network device over a data network, a first indication that the first zone player has been added to a first zone scene comprising a first predefined grouping of zone players including at least the first zone player and a second zone player that are to be configured for synchronous playback of media when the first zone scene is invoked; and
 - [1.7]** (ii) receiving, from the network device over the data network, a second indication that the first zone player has been added to a second zone scene comprising a second predefined grouping of zone players including at least the first zone player and a third zone player that are to be configured for synchronous playback of media when the second zone scene is invoked, wherein the second zone player is different than the third zone player;
 - [1.8]** after receiving the first and second indications, continuing to operate in the standalone mode until a given one of the first and second zone scenes has been selected for invocation;
 - [1.9]** after the given one of the first and second zone scenes has been selected for invocation, receiving, from the network device over the data network, an instruction to operate in accordance with a given one of the first and second zone scenes respectively comprising a given one of the first and second predefined groupings of zone players; and
 - [1.10]** based on the instruction, transitioning from operating in the standalone mode to operating in accordance with the given one of the first and second predefined groupings of zone players such that the first zone player is configured to coordinate with at least one other zone player in the given one of the first and second predefined groupings of zone players over a data network in order to output media in synchrony with output of media by the at least one other zone player in the given one of the first and second predefined groupings of zone players.



Google's Excuses



Dr. Almeroth



Dr. Almeroth

Technical Expert



Education

Georgia Institute of Technology

- Ph.D. Computer Science 1997
- M.S. Computer Science 1994
- B.S. Computer Science 1992

Academic Appointments

- **Professor Emeritus, Dept. of Computer Science** UC Santa Barbara (2020-Present)
- **Professor, Dept. of Computer Science** UC Santa Barbara (1997-2020)
- **Vice Chair, Dept. of Computer Science** UC Santa Barbara (2001-2005)
- **Associate Dean, College of Engineering** UC Santa Barbara (2007-2009)

Research Experience

- **25+** years of experience as a computer networking researcher
- Approximately **200** peer-reviewed publications
- **19** released software systems

Infringement – Conclusion

Google
Infringe?

Asserted Claims

Accused Google Products

Version

'885 Patent
Claim 1



Prior Versions
(Nov. 2020 – Present)

New Version
(Dec. 2022 – Present)



'966 Patent
Claims
1, 2, 4, 6, 8



Google

Representative Computing Devices



Prior Versions
(Nov. 2019 – Present)

New Version
(Dec. 2022 – Present)



Infringement of '966 Patent, Claim 1

- [1.0] A computing device comprising: ✓
- [1.1] one or more processors; ✓
- [1.2] a non-transitory computer-readable medium; and; ✓
- [1.3] program instructions stored on the non-transitory computer-readable medium that, when executed by the one or more processors, cause the computing device to perform functions comprising: ✓
 - [1.4] while serving as a controller for a networked media playback system comprising a first zone player and at least two other zone players, wherein the first zone player is operating in a standalone mode in which the first zone player is configured to play back media individually: ✓
 - [1.5] receiving a first request to create a first zone scene comprising a first predefined grouping of zone players including at least the first zone player and a second zone player that are to be configured for synchronous playback of media when the first zone scene is invoked; ✓
 - [1.6] based on the first request, i) causing creation of the first zone scene, ii) causing an indication of the first zone scene to be transmitted to the first zone player, and iii) causing storage of the first zone scene; ✓
 - [1.7] receiving a second request to create a second zone scene comprising a second predefined grouping of zone players including at least the first zone player and a third zone player that are to be configured for synchronous playback of media when the second zone scene is invoked, wherein the third zone player is different than the second zone player; ✓
 - [1.8] based on the second request, i) causing creation of the second zone scene, ii) causing an indication of the second zone scene to be transmitted to the first zone player, and iii) causing storage of the second zone scene; ✓
 - [1.9] displaying a representation of the first zone scene and a representation of the second zone scene; and ✓
 - [1.10] while displaying the representation of the first zone scene and the representation of the second zone scene, receiving a third request to invoke the first zone scene; and ✓
 - [1.11] based on the third request, causing the first zone player to transition from operating in the standalone mode to operating in accordance with the first predefined grouping of zone players such that the first zone player is configured to coordinate with at least the second zone player to output media in synchrony with output of media by at least the second zone player. ✓

Key Points

Sonos “Zone Scene” Patents

Google Infringes

No Non-Infringing Alternatives

Sonos Patents Valid

Damages Owed To Sonos

No Acceptable Non-Infringing Alternatives

'885 Patent
Claim 1

Acceptable Non-Infringing Alternatives?



'966 Patent
Claims
1, 2, 4, 6, 8

Acceptable Non-Infringing Alternatives?



STILL INFRINGING

NOT ACCEPTABLE

Key Points

Sonos “Zone Scene” Patents

Google Infringes

No Non-Infringing Alternatives

Sonos Patents Valid

Damages Owed To Sonos

Presumption Of Validity And High Burden Of Proof

- A patent is **presumed valid**
- Google must prove invalidity by **clear and convincing evidence**



USPTO Already Considered Sonos's 2005 System



TrackOne Request

PTO/AIA/424 (04-14)

APPLICATION AND REQUEST FOR PRIORITIZED EXAMINATION
UNDER 37 CFR 1.102(e) (Page 1 of 1)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TRIAL EXHIBIT 0006

CASE NO. 3:20-cv-06754-WHA
DATE ENTERED: _____
BY: _____
DEPUTY CLERK

Robert A. Lambourne Nonprovisional Application Number (if known): _____

Zone Scene Management

APPLICANT HEREBY CERTIFIES THE FOLLOWING AND REQUESTS PRIORITIZED EXAMINATION FOR THE ABOVE-IDENTIFIED APPLICATION.

1. The processing fee set forth in 37 CFR 1.17(i)(1) and the prioritized examination fee set forth in 37 CFR 1.17(c) have been filed with the request. The publication fee requirement is met.

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3. The

I.

i. (a)

(b)

- ii. An executed inventor's oath or declaration under 37 CFR 1.63 or 37 CFR 1.64 for each inventor, or the application data sheet meeting the conditions specified in 37 CFR 1.53(f)(3)(i) is

22

Sonos Digital Music System User Guide, Version: 050801, August 2005, 114 pages.

Examiner Signature

/PAUL C MCCORD/

07/01/2019

Date Considered

- v. No prior request for continued examination has been granted prioritized examination status under 37 CFR 1.102(e)(2).

Signature: /Brandon J. Kennedy/	Date: April 12, 2019
Name (Print/Typed): Brandon J. Kennedy	Practitioner Registration Number: 67,894
<p>Note: This form must be signed in accordance with 37 CFR 1.33. See 37 CFR 1.4(d) for signature requirements and certifications. Submit multiple forms if more than one signature is required.</p>	
<input type="checkbox"/> Total of _____ forms are submitted.	

TX0006, Page 1 of 6710

SONOS-SVG2-00011280

TX0006 at SONOS-SVG2-00015096, 99

USPTO Already Considered Squeezebox



TrackOne Request		PTO/AIA/424 (04-14)
APPLICATION AND REQUEST FOR PRIORITIZED EXAMINATION UNDER 37 CFR 1.102(e) (Page 1 of 1)		
Robert A. Lambourne	Nonprovisional Application Number (if known)	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA TRIAL EXHIBIT 0006 CASE NO. 3:20-cv-06754-WHA DATE ENTERED _____ BY _____ DEPUTY CLERK
Zone Scene Management		

SIGNIFICANT HISTORY OF THE ABOVE-IDENTIFIED REFERENCES

1. The prior art references are not relevant to the claims of the application because they do not disclose the claimed invention.
2. I understand the independent claim to be independent of any other claim.
3. The application is an original nonprovisional utility application filed under 35 U.S.C. 111(a).

I. ☒

- i. (a) The application is an original nonprovisional utility application filed under 35 U.S.C. 111(a). This certification and request is being filed with the utility application via EFS-Web.

(b) The application is a continuation-in-part of a previously filed application.

- ii. An examination of the application has been requested.

II. ☐

- i. A request for examination of the application has been requested.
- ii. If the application is a continuation-in-part of a previously filed application, the application is a continuation-in-part of a previously filed application.
- iii. The application is a continuation-in-part of a previously filed application.
- iv. This certification and request is being filed with the utility application via EFS-Web.
- v. No prior art has been searched.

under 37 CFR 1.102(e)(2).

24

Squeezebox Network Music Player. Owner's Manual, Slim Devices, 2003, 22 pages.

14

NewsRoom. Slim Devices Introduces Slimserver, 18 November 2003, 2 pages.

Examiner Signature

/PAUL C MCCORD/ 08/06/2020

Date Considered

TX0006, Page 1 of 6710

SONOS-SVG2-00011280

TX0006 at SONOS-SVG2-00017867, 68

TX0006 at SONOS-SVG2-00017881, 84

USPTO Already Considered Bose



TrackOne Request

PTO/AIA/424 (04-14)

DECLARATION AND REQUEST FOR PRIORITIZED EXAMINATION
UNDER 37 CFR 1.102(e) (Page 1 of 1)

Robert A. Lambourne Nonprovisional Application Number (if known)

Zone Scene Management

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TRIAL EXHIBIT 0006

CASE NO. 3:20-cv-06754-WHA
DATE ENTERED
BY
DEPUTY CLERK

APPLICANT HEREBY CERTIFIES THE FOLLOWING AND REQUESTS PRIORITIZED EXAMINATION FOR THE ABOVE-IDENTIFIED APPLICATION.

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- I.
- i. (a)

9

Bose. The Bose Lifestyle 50 System. Owner's Guide, October 17, 2001, 55 pages.

- (b) The application is an original nonprovisional plant application filed under 35 U.S.C. 111(a). This certification and request is being filed with the plant application in paper.

Examiner Signature

/PAUL C MCCORD/

08/06/2020 Date Considered

- a national stage entry under 35 U.S.C. 371.
- iv. This certification and request is being filed prior to the mailing of a first Office action responsive to the request for continued examination.
 - v. No prior request for continued examination has been granted prioritized examination status under 37 CFR 1.102(e)(2).

Signature: /Brandon J. Kennedy/	Date: April 12, 2019
Name (Print/Typed): Brandon J. Kennedy	Practitioner Registration Number: 67,894
<p>Note: This form must be signed in accordance with 37 CFR 1.33. See 37 CFR 1.4(d) for signature requirements and certifications. Submit multiple forms if more than one signature is required.</p>	
<input type="checkbox"/> Total of _____ forms are submitted.	

TX0006, Page 1 of 6710

SONOS-SVG2-00011280

TX0006 at SONOS-SVG2-00017909, 13

The Patent Office Considered Prior Art



Request
AND REQUEST FOR PRIORITIZED EXAMINATION
UNDER 37 CFR 1.102(e) (Page 1 of 1)

Applicant: Lambourne
Inventor: Lambourne
Provisional Application Number (if known):
Serial Number: 15/000,000
Date of Filing: 03/12/2019
Priority Date: 03/12/2019

CERTIFIES THE FOLLOWING AND REQUESTS PRIORITIZED EXAMINATION FOR THE FOLLOWING APPLICATION.

- The processing fee set forth in 37 CFR 1.17(c)(1) and the prioritized examination fee set forth in 37 CFR 1.17(c) have been filed with the request. The publication fee requirement is met because that fee, set forth in 37 CFR 1.18(b), is currently \$0. The basic filing fee, search fee, and examination fee are filed with the request or have been already been paid. I understand that any required excess claims fees or application size fee must be paid for the application.
- I understand that the application may not contain, or be amended to contain, more than four independent claims, more than thirty total claims, or any multiple dependent claims, and that any request for an extension of time will cause an outstanding Track I request to be dismissed.
- The applicable box is checked below:
 - ☒ Original Application (Track One) - Prioritized Examination under 37 CFR 1.102(e)(1)
 - The application is an original nonprovisional utility application filed under 35 U.S.C. 111(a). This certification and request is being filed with the utility application via EFS-Web.
 - The application is an original nonprovisional plant application filed under 35 U.S.C. 111(a). This certification and request is being filed with the plant application in paper.
 - An executed inventor's oath or declaration under 37 CFR 1.63 or 37 CFR 1.64 for each inventor, or the application data sheet meeting the conditions specified in 37 CFR 1.53(f)(3)(i) is filed with this application.
 - ☐ Request for Continued Examination - Prioritized Examination under 37 CFR 1.102(e)(2)
 - A request for continued examination has been filed with, or prior to, this form.
 - If the application is a utility application, this certification and request is being filed via EFS-Web.
 - The application is an original nonprovisional utility application filed under 35 U.S.C. 111(a), or is a national stage entry under 35 U.S.C. 371.
 - This certification and request is being filed prior to the mailing of a first Office action responsive to the request for continued examination.
 - No prior request for continued examination has been granted prioritized examination status under 37 CFR 1.102(e)(2).

Signature: Brandon J. Kennedy Date: April 12, 2019
Name: Brandon J. Kennedy Practitioner Registration Number: 67,894
Note: This form must be signed in accordance with 37 CFR 1.33. See 37 CFR 1.40(i) for signature requirements and certifications. Submit multiple forms if more than one signature is required.
☐ Total of _____ forms are submitted.

TX0006, Page 1 of 6710 SONOS-SVG2-00011280

22 Sonos Digital Music System User Guide, Version: 050801, August 2005, 114 pages.

24 Squeezebox Network Music Player. Owner's Manual, Slim Devices, 2003, 22 pages.

14 NewsRoom. Slim Devices Introduces Slimserver, 18 November 2003, 2 pages.

9 Bose. The Bose Lifestyle 50 System. Owner's Guide, October 17, 2001, 55 pages.

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Key Points

Sonos “Zone Scene” Patents

Google Infringes

No Non-Infringing Alternatives

Sonos Patents Valid

Damages Owed To Sonos

James Malackowski

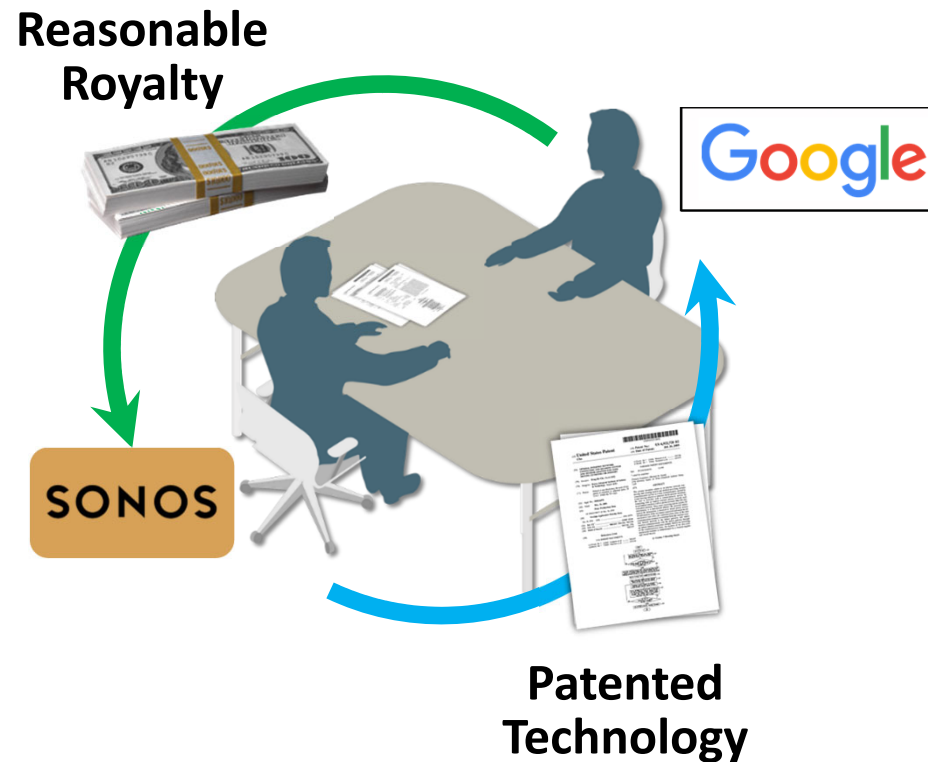


**James
Malackowski**
Economist



- Senior Managing Director of **Ocean Tomo, LLC**, a part of J.S. Held
- **Inventor** on 20 issued patents
- Summa Cum Laude graduate of the **University of Notre Dame** majoring in accountancy and philosophy
- **Certified Public Accountant**
- **Certified Licensing Professional**
- **Adjunct Instructor** for graduate studies on IP management
- Served as an **expert** on questions relating to intellectual property economics on over 100 occasions

Hypothetical negotiation



The royalty that a licensor (such as Sonos) and a licensee (such as Google) would have agreed upon if both had been **reasonably and voluntarily trying to reach an agreement**

Reasonable Royalty Damages

Hypothetical negotiation would have resulted in
a **per-unit reasonable royalty rate** of

'966 Patent

\$0.82

November 5, 2019 –
September 30, 2022

'885 Patent

\$0.87

November 24, 2020 –
November 15, 2022

Reasonable Royalty Damages – '966 Patent

Period	Royalty Rate	Infringing Installs	Reasonable Royalty
11/05/2019 – 12/31/2019	\$0.82	7,116,206	\$5,829,646
01/01/2020 – 12/31/2020	\$0.82	30,414,646	\$24,915,890
01/01/2021 – 12/31/2021	\$0.82	30,785,932	\$25,293,778
01/01/2022 – 11/15/2022	\$0.82	26,254,183	\$21,507,609
	\$0.82	94,660,967	\$77,546,923

Reasonable Royalty Damages – '885 Patent

Period	Royalty Rate	Infringing Units	Reasonable Royalty
11/24/2020 – 12/31/2020	\$0.87	2,011,080	\$1,742,539
01/01/2021 – 12/31/2021	\$0.87	8,749,080	\$7,580,810
01/01/2022 – 09/30/2022	\$0.87	3,373,398	\$2,922,946
	\$0.87	14,133,558	\$12,246,294

Reasonable Royalty Damages

Hypothetical negotiation would have resulted in
a *reasonable royalty payment* of

'966 Patent

\$77,546,923

November 5, 2019 –
September 30, 2022

'885 Patent

\$12,246,294

November 24, 2020 –
November 15, 2022